## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time:

April 7, 2004

Site Contact(s):

**Dvan Foss** 

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Regulatory Contact: Edd Kray

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Agency:

**CDPHE** 

Purpose of Contact:

Survey Unit 21 Disposition

## Discussion

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Survey Unit 21 for demolition. Survey Unit 21 consists of rooms 452, 455, 457, 461, and 475.

The preparation process for Survey Unit 21 was initiated December 4, 2003 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the results were discussed at the weekly 776/777 survey status meeting, and the decision was made to complete the following:

- Remove the contaminated metal from trough
- Remove contaminated bolts from concrete floor
- Shave areas on the floors with highest sodium iodide readings

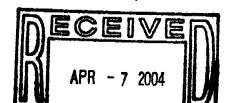
The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey Unit 21. The following summarizes the non-radiological activities:

Room 452 provided secondary containment for mixed residue piping and equipment. Rinsate samples were analyzed and compared to the closure performance standard in Section 4.5.1.1 of the B776/777 Decommissioning Operations Plan (DOP). On February 4, 2004, Mr. Hindman concurred that the area in question have been closed, contingent on final disposition of the building by removal, as is required in the approved Demolition Plan for the facility. The waste will be managed as non-hazardous low-level debris for disposal.

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- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Rooms 452, 455, 457, & 475 were listed on the historical list of rooms. The historical record indicates machining and storage of beryllium parts took place in these room. The rooms in this survey unit that were posted as a Beryllium Controlled Area (452, 455, 457, 475) were decontaminated and removed from beryllium postings in September 2003. Since the baseline survey, the rooms have been stripped of all equipment. The final beryllium surveys for this area was collected on horizontal surfaces from floor to ceiling, and all samples were below the reporting limit of 0.1 ug/100 cm<sup>2</sup>.
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction, which would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey Unit 21 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey Unit 21 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. This contact record will be included as an appendix to the characterization report for Survey Unit 21.

Contact Record Prepared By: Dyan Foss		
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Required Distribution:		Additional Distribution:
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